

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE:

CASE NO: 23-52088
Chapter 13 (Judge Hoffman)

Robert Clark
Josette Clark
Debtors

MEMORANDUM CONTRA MOTION TO DISMISS CASE

Now comes the above captioned Debtor, who respectfully Objects to the Trustee's Motion to dismiss his Chapter 13 Bankruptcy Proceeding.

The Debtors admit they have fallen behind on payments due to some unexpected expenses. They have now resumed making payments into their Chapter 13 Plan and will continue to fund the plan on a timely manner. The Debtor has also corrected the amount they were paying as it was less than their monthly payment.

Wherefore, the Debtors respectfully request the Court to deny the Trustee's Motion to Dismiss his case.

/s/ Derek M Shaw
Derek M Shaw 0089865
Calig Law Firm
513 E Rich Street, Suite 210
Columbus OH 43215
(614)252-2300

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served **electronically** upon Assistant U.S. Trustee, 170 North High Street, Suite 200, Columbus, OH 43215 and Faye English, Chapter 13 Trustee 5763 this 31st day of January 2025.

/s/ Derek M. Shaw
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